

COHEN & GREEN

August 16, 2023

BY ECF

Hon. Ann M. Donnelly
United States District Court
Eastern District of New York
225 Cadman Plaza East, 1214 South
Brooklyn, New York 11201

Re: Payamps v. City of New York, 22-cv-00563

Dear Judge Donnelly:

This firm along with co-counsel represents the Plaintiff. On August 9th, Defendants served a Rule 68 Offer of Judgment, attached as Exhibit 1. On August 15th, Plaintiff accepted the Rule 68 by notifying defense counsel in writing as specified in the Rule 68. Plaintiff respectfully requests that the Court endorse the attached proposed judgment attached as Exhibit 2.

Plaintiff also respectfully requests that the Court issue an Order extending Plaintiff's counsels' time to make an application for attorney's fees from the current August 23rd deadline up to and including October 22, 2023 to allow the parties time to resolve the issue of fees without motion practice. Defendants consent to this request.

We thank the Court for its time and consideration.

Respectfully submitted,

/s/

Jessica Massimi

Pronouns: She/Her

COHEN & GREEN P.L.L.C.

Attorneys for Plaintiff

1639 Centre St., Suite 216

Ridgewood, New York 11385

cc:

All relevant parties by ECF.